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6  
7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 PERIENNE DE JARAY,

11 Plaintiff,

12 v.

13 ATTORNEY GENERAL OF CANADA FOR  
14 HER MAJESTY THE QUEEN, CANADIAN  
BORDER SERVICES AGENCY, GLOBAL  
15 AFFAIRS CANADA fka DEPARTMENT OF  
FOREIGN AFFAIRS AND  
16 INTERNATIONAL TRADE CANADA,  
GEORGE WEBB, KEVIN VARGA, and  
17 PATRICK LISKA,

18 Defendants.

No.: 2:16-cv-00571

DECLARATION OF ANDREW C.  
LAUERSDORF IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO  
DEFENDANTS' MOTION TO DISMISS

19 I, Andrew C. Lauersdorf, declare as follows:

20 1. I am an attorney with the law firm of Maloney Lauersdorf Reiner, PC, counsel to  
21 Plaintiff Perienne de Jaray in this matter. I have personal knowledge of the following facts  
22 gained in my capacity as counsel.

23 2. Attached at Exhibit 1 is a true and correct copy of an email from Assistant United  
24 States Attorney Todd Greenberg to Mark Bartlett in Seattle. My office received a copy of the  
25 email from Mr. Bartlett, who was counsel to Perienne de Jaray.

26 3. Attached at Exhibit 2 is a true and correct copy of a "Will Say" of Experts Tom

1 Jones and Chris Fauquier. I understand that the attorneys for Steven de Jaray provided a copy of  
2 this "Will Say" to the Government of Canada during Mr. de Jaray's civil suit.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is  
4 true and correct to the best of my knowledge, information, and belief.

5 DATED this 17th day of October, 2016.

6  
7 /s/Andrew C. Lauersdorf

8 Andrew C. Lauersdorf, WSBA #35418  
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